

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PAULA BURKE-GREEN-WARREN,

Plaintiff,

v.

WORLDWIDE FLIGHT SERVICES, INC., INDIGO
PARTNERS & FRONTIER AIRLINES HOLDINGS,
INC. d/b/a FRONTIER AIRLINES,

Defendants.

**MOTION FOR ADMISSION
OF PATRICK V. MELFI TO
APPEAR *PRO HAC VICE***

Civil Action No.:
3:23-cv-02082-PGS-DEA

Pursuant to New Jersey Local Rule 101.1(c), I, Samuel G. Dobre, a member in good standing of the Bars of the state of New Jersey and the United States District Court for the District of New Jersey, on behalf of the Defendant WORLDWIDE FLIGHT SERVICES, INC., (“Defendant WFS”), respectfully moves for the admission *pro hac vice* of Patrick V. Melfi (“Applicant”). As stated in his attached Certification, Patrick V. Melfi, a member of the Bar of the State of New York, seeks admission to this Court, *pro hac vice*, for the purpose of representing Defendant WFS in the above referenced matter. As grounds therefore, Movant states that:

1. Applicant is a member in good standing of the aforementioned court. See Certification of Patrick V. Melfi, attached.

2. Applicant is not subject to any disciplinary proceedings as a member of any bar, and has not been disciplined in any manner in any jurisdiction. *See Id.*

3. Applicant has read, and is familiar, with the applicable provisions of the Local Rules of the United States District Court for the District of New Jersey. *See Id.*

4. Applicant is a solo practitioner at Melfi Law, LLC, 949 County Route 53, Oswego, NY 13126, pmelfi@melfilaw.com, 315.532.3401.

4. Samuel G. Dobre is an active member in good standing of the Bar of the state of

New Jersey, and is counsel of record in this case for Defendant WFS. Attorney Dobre is an attorney of the law firm of Bond Schoeneck & King PLLC.

WHEREFORE, Defendant WFS, through undersigned counsel, respectfully requests that Applicant Patrick V. Melfi be admitted to practice before this Court pro hac vice for the purpose of appearing as its counsel of choice in the above-captioned matter in accordance with the Rules of this Court.

Dated: New York, New York
February 20, 2024

BOND, SCHOENECK & KING, PLLC

By: /s/
Samuel G. Dobre
600 Third Avenue, 22nd Floor
New York, NY 10016-1915
Telephone: (646) 253-2320
Fax: (646) 253-2377
sdobre@bsk.com

*Attorneys for Defendant Worldwide Flight
Services Inc.*